

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

BEN VEAL,

Plaintiff,

v.

RUBBERMAID COMMERCIAL  
PRODUCTS, LLC,

Defendant.

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Civil Action No. 1:14-cv-05810

**JOINT MOTION FOR EXTENSION OF TIME**

Plaintiff Ben Veal (“Veal”) and Defendant Rubbermaid Commercial Products, LLC (“Rubbermaid”) hereby jointly requests an extension of time to complete fact discovery by approximately sixty (60) days, *i.e.*, until **February 12, 2016**, and re-set expert discovery accordingly. In support thereof, the parties states as follows:

The parties have exchanged initial discovery. The parties have met and conferred regarding the potential need for supplementing production. The parties have been working cooperatively in resolving their discovery issues; however, additional time is needed. Defendants have recently produced sales data necessary for depositions to be taken and have indicated that there are additional documents that have not yet been produced but will be soon. Fact discovery is currently set to close on December 11, 2015. The parties believe that additional time is needed to complete fact discovery, in particular to resolve the remaining written discovery issues and conduct depositions.

The parties propose the following updates:

<b>Event</b>	<b>Previous Date</b>	<b>New Date</b>
Fact discovery to close	December 11, 2015	February 12, 2016
Plaintiff's expert reports due	January 15, 2016	March 11, 2016
Defendant's expert reports due	February 15, 2016	April 15, 2016
All expert discovery to be complete	May 13, 2016	July 15, 2016

WHEREFORE, Veal and Rubbermaid request this Court extend fact discovery by sixty (60) days and re-set expert discovery accordingly.

Dated: December 2, 2015

Respectfully Submitted,

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